

October 13, 2014

Petition for Exemption From Closed Captioning Due To Economic Burden  
Case Identifier: CGB-CC-0406

Dear Sirs:

This is coming in response to a letter where you requested additional information for our petition.

- 1) You had question regarding the nature and cost of the closed captions for each program. You asked that for each of the quotes we received, from VITAC and Closed Caption Maker we provide you with an annual cost.

The quote from VITAC is for \$300.00 per program (x 52 weeks) is an annual cost of \$15,600.00  
The quote from Closed Caption Maker is for \$250.00 per program (x52 weeks) is an annual cost of \$13,000.00

- 2) You said that we did not satisfy your requirements for the income and expenses of the church. We sent previously the audited financial statements of the church. You asked that the information in the "Schedule 1 for General Supporting Expenses" be sent for 2011 and 2012. Those schedules are attached.

- 3) You asked that we provide more information on the sponsorship for captioning our program. We are a local church, whose sole mission is to spread the Gospel of Jesus Christ to our community. Our program is a way for us to give to those who live in this area, not to ask anything from them. We will, on occasion, offer our programs on DVD or CD. Most of the time, Pastor will offer these at no charge to the viewer. However, if there is a charge, we keep the cost to a minimum. We have been a part of this Beaumont community for 58 years, and have never solicited any type of service, or sponsorship from anyone. Since we have no intention of soliciting such sponsorships from our viewers, your decision regarding this matter may prohibit us from continuing our Television Ministry after being on the air for approximately 55 years. We have a very strong viewership, and Pastor is approached regularly by people who faithfully view our program. We want to be able to continue in this ministry to the people of this area, and an exemption from Closed Captioning would help us to continue to air this program. If over these years we had been asked by hearing impaired viewers to include Closed Captioning, we certainly would have considered doing so. However, we cannot recall an incident where we have been asked, by viewers, to Closed Caption our program.

Attached with this letter is a copy of the "Schedule 1" for our audited financial statements, along with the Affidavit you requested. We respectfully ask that you would grant our Petition for Exemption.

**VICTORY ASSEMBLY CHURCH OF BEAUMONT**  
**SUPPLEMENTARY INFORMATION**  
**YEARS ENDED DECEMBER 31,**

	<u>2012</u>	<u>2011</u>
SCHEDULE 1 - GENERAL SUPPORTING EXPENSES		
Advertising	\$ -	\$ 5,555
Audio visual	17,160	30,599
Auto allowance	9,600	10,400
Auto expense	5,719	7,477
Bank charges	1,447	1,707
Care ministries	1,043	3,760
Contract labor	295	-
Contributions	2,100	1,100
Decorations	-	431
Depreciation	256,033	256,783
Flowers	2,560	3,372
Freight/postage	3,485	3,405
Housing	78,352	84,840
Insurance	69,604	140,501
Janitorial	3,153	4,227
Legal and professional	25,236	24,150
Maintenance contracts	10,850	8,501
Meals and entertainment	5,452	6,407
Office equipment	2,916	6,457
Office supplies	20,245	10,903
Printing	-	1,759
Rent	13,568	15,086
Repairs and maintenance	18,485	22,284
Salaries	244,646	230,998
Storage	2,184	3,584
Travel	265	-
Utilities	50,652	61,382
	<u>50,652</u>	<u>61,382</u>
<b>TOTAL GENERAL SUPPORTING EXPENSES</b>	<b><u>\$ 845,050</u></b>	<b><u>\$ 945,668</u></b>

AFFIDAVIT OF ROBERT TURNAGE

STATE OF TEXAS

COUNTY OF JEFFERSON

Before me, the undersigned authority personally appeared ROBERT TURNAGE, a person known to me. After I administered an oath, he testified as follows:

1. My name is ROBERT TURNAGE. I am over the age of eighteen, of sound mind and fully capable of making this affidavit. The facts set forth in this affidavit are within my personal knowledge and are true and correct.
2. I hereby attest that the attached, up to date, evidence provided with my Petition Requesting Exemption from the Closed Captioning Requirements of our program are true and correct. I have personal knowledge of the content contained within the evidence. I oversaw the gathering of evidence and supervised its assembly for purposes of providing to the Federal Communications Commission. I am authorized to speak for Victory Temple, and on behalf of Victory Temple we provide the attached evidence to support our claim that the closed captioning requirement would be economically burdensome and would result in significant difficulty or expense on Victory Temple.

Attached to our petition and this affidavit is documentation of our financial status to demonstrate the economic burden closed captioning would put on the church. I further verify that I have obtained this information about the cost of closed captioning for our specific program. I further verify that I have sought closed captioning assistance from our program distributor and that such is not provided by our program distributor.

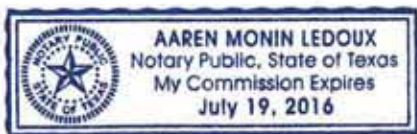
I attest that the information contained in our petition is true and correct.

FURTHER AFFIANT SAYETH NOT.

Robert Turnage

NAME

SUBSCRIBED and SWORN TO, before me, on the 13 day of October, 2014



[Signature]  
Notary Public